

IN THE UNITED STATES COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION
CIVIL ACTION NO. 11-CV-198

THE NORTH CAROLINA GROWERS'
ASSOCIATION, INC.,

Plaintiff,

v.

HILDA L. SOLIS, U.S. DEPARTMENT OF
LABOR, MAS LABOR, MAS-H2A, K-T
LABOR, AWMA, L.L.C., AND ANDREW
JACKSON,

Defendant.

**THIRD CONSENT MOTION FOR
EXTENSION OF TIME TO ANSWER OR
OTHERWISE PLEAD**

COMES NOW the Defendant AWMA, L.L.C., ("AWMA") through undersigned counsel, and respectfully shows unto the Court that it was served with Plaintiff's original Complaint on March 14, 2011, was subsequently made aware of the filing of the Amended Complaint on March 24, 2011 via the Court's CM/ECF case management system, procured an extension of time to respond to the Amended Complaint up to and including July 11, 2011, and that time for responding has not yet expired. AWMA also shows the Court that undersigned counsel has been in discussions with Plaintiff's Counsel and learned that the Plaintiff and Defendant Department of Labor are still participating in settlement discussions that may obviate the need for AWMA to respond to the lawsuit. Therefore, with the consent of the Plaintiff's Counsel, Robin Shea, AWMA respectfully moves the Court for an extension of time within which to respond to the Amended Complaint, up to and including the 1st day of September, 2011 in order to determine whether a settlement can be reached to avoid the costs associated with responding to the lawsuit.

Respectfully submitted, June 29, 2011.

BROWN LAW LLP

/s/ Jessica C. Tyndall

JESSICA C. TYNDALL

NC Bar # 28475

4130 Parklake Avenue, Suite 130

Raleigh, North Carolina 27612

T: 919.719.0854

F: 919.719.0858

jessica@brownlawllp.com

Counsel for Defendant AWM

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 29th day of June, 2011, a copy of the foregoing document was filed electronically via the Court's CM/ECF case management system and served via the Court's CM/ECF case management system on the following parties:

W.R. Loftis, JR
Robin E. Shea
Constangy, Brooks & Smith, LLP
100 N. Cherry Street, Suite 300
Winston-Salem, North Carolina 27101
rloftis@constangy.com
rshea@constangy.com
Counsel for Plaintiff

Jessica W. P. D'Arrigo
United States Department of Justice
Post Office Box 868
Ben Franklin Station
Washington, DC 20044
Jessica.W.DArrigo@usdoj.gov
Counsel for Defendants Hilda L. Solis and U.S. Department of Labor

Geoffrey Forney
U. S. Department of Justice
Civil Division
450 Fifth Street, Northwest
Washington, DC 20001
geoff.forney@usdoj.gov
Counsel for Defendants Hilda L. Solis and U.S. Department of Labor

Aaron James Longo
McGuire Woods, LLP
100 North Tryon Street, Suite 2900
Bank Of America Corporate Center
Charlotte, North Carolina 28202-4011
alongo@mcguirewoods.com
Counsel for Defendants MAS Labor, MAS-H2A, and Labor Services International, LLC

Andrew Miller Jackson
Andrew M. Jackson, Attorney At Law
Post Office Box 27
Clinton, North Carolina 28329-0027
andrewjacksonclinton@yahoo.com
Counsel for Defendant Andrew Jackson

/s/ Jessica C. Tyndall

BROWN LAW LLP